

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

PPT RESEARCH, INC.,

Plaintiff,

v.

SOLVAY USA, INC., d/b/a SOLVAY-  
RHODIA, SOLVAY, AND SOLVAY USA;  
and RHODIA OPERATIONS S.A.S. d/b/a  
RHODIA-SOLVAY, SOLVAY-RHODIA,  
RHODIA, RODIA S.A., RHODIA-FRANCE,  
RHODIA, INC., AND RHODIA GROUP.,

Defendants.

Civil Action No. 5:20-cv-02645-JLS

**DECLARATION OF LAURENT THOMAS IN SUPPORT OF SOLVAY USA, INC.'S  
MOTION TO COMPEL ARBITRATION AND TO DISMISS THE COMPLAINT, OR  
ALTERNATIVELY, STAY PROCEEDINGS**

I, Laurent Thomas, declare as follows:

1. I am currently Executive Vice President Oil and Gas for Solvay's Novicare Global Business Unit. From November 2013 through August 2019, I was Vice President of Strategy for Solvay's Novicare Global Business Unit.
2. I am familiar with the Reciprocal Confidentiality Agreement ("RCA") entered into between Rhodia Operations S.A.S ("Rhodia") and PPT Research, Inc. ("PPT") effective June 9, 2014. I executed this RCA on behalf of Rhodia and I had authority to do so. My signature appears on page 5 for Rhodia. A true and correct copy of this RCA is attached to this declaration as Exhibit 1.
3. I am also familiar with the First Amendment to Reciprocal Confidentiality Agreement dated as of August 07, 2014 between PPT and Rhodia as well as by Solvay USA


Inc. who became added as a party to the RCA. I executed the First Amendment to Reciprocal Confidentiality Agreement on behalf of Solvay USA Inc. and I had authority to do so. My signature appears on page 3 of the First Amendment to Reciprocal Confidentiality Agreement for Solvay USA Inc. A true and correct copy of this First Amendment to Reciprocal Confidentiality Agreement is attached to this declaration as Exhibit 2.

4. I am familiar with the Technology License Agreement (“TLA”), effective February 20, 2015, entered into between PPT and Solvay USA Inc. John Foley signed the TLA for Solvay USA Inc. with proper authority as VP GM Novocare NA. I recognize John Foley’s signature on page 18 of the TLA. A true and correct copy of the TLA is attached to this declaration as Exhibit 3.

5. I am also familiar with the First Amendment to Technology License Agreement effective as of April 6, 2016 between PPT and Solvay USA Inc. I signed the First Amendment to Technology License Agreement on page 5 for Solvay USA Inc. and I had authority to do so. A true and correct copy of the First Amendment to Technology License Agreement is attached to this declaration as Exhibit 4.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and accurate.

Executed this 30 day of June 2020, in Princeton, New Jersey.

  
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Laurent Thomas

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